

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Brent Alan-Ducolon Zaragoza

Case No. 1:22-mj-30074

Judge: Morris, Patricia T.

Filed: 02-16-2022

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 13, 2021 in the county of Isabella in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

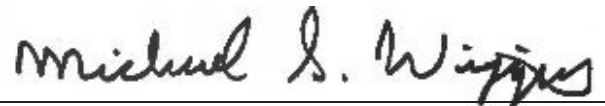
18 U.S.C. § 2252(a)(5) and (b)(1)

Defendant, knowingly possessed images of child pornography, as defined by Title 18, United States Code, Section 2256(8), which involved a prepubescent minor or a minor who had not attained 12 years of age, such images having been produced by using materials affecting interstate or foreign commerce by any means and defendant has a prior conviction under state law relating to the possession of child pornography, in violation of 18 U.S.C. sections 2252(a)(5) and (b)(1).

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

*Complainant's signature*Michael Wiggins, FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: February 16, 2022*Judge's signature*City and state: Bay City, MichiganPatricia T. Morris, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT

I, Michael S. Wiggins, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code.

2. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice (DOJ), currently assigned to the FBI's Detroit Division, Flint Resident Agency (FLRA). I have been so employed since March 2004. I am currently assigned as the Coordinator and a member of the Northeast Michigan Trafficking and Exploitation Crimes Task Force (NEMTEC) which is a Federal Bureau of Investigation (FBI) managed task force with investigative members assigned from the Michigan State Police (MSP) and FBI. It is tasked with addressing Crimes Against Children and Human Trafficking threats in coordination and cooperation with its local and state partners.

3. As part of my employment, I have received training in and been involved in investigations regarding human trafficking, exploitation of children, drug trafficking, money laundering, threats, financial crimes, crimes involving gang related activities, child pornography and other violations of federal law.

4. I am conducting an investigation related to violations of the following statute: 18 U.S.C. § 2252A(a)(5) and (b)(1) (Possession of Child Pornography). Based on the evidence discovered during the course of my investigation, probable cause exists that Brent Alan-Ducolon Zaragoza (DOB XX/XX/1985) committed violations of the above statute within the Eastern District of Michigan.

5. This Affidavit is submitted for the limited purpose of establishing probable cause; this affidavit, therefore, may not include all the information collected during this investigation. This Affidavit is intended to show only that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter. The information contained in this affidavit is based on personal knowledge, on reports made to me by other law enforcement officers, my training and experience, and the combined knowledge, training, and experience of other law enforcement officers and agents with whom I have had discussions.

PROBABLE CAUSE

6. On or about September 3, 2014, Zaragoza was convicted in the State of Michigan Circuit Court, 10th Circuit Court, Saginaw County, Michigan, of Child Sexually Abusive Material – Possession. As such, he was required to register as a sex offender with the State of Michigan.

7. On or about August 9, 2018, Zaragoza was sentenced to a three-year term of probation in the State of Michigan Circuit Court, 10th Circuit Court, Saginaw County, Michigan, for a drug related offense. On or about August 3, 2021, his term of probation was extended one year to August 9, 2022, by order of the court “...to allow for payment of Court ordered financial obligations.” On or about August 18, 2021, Zaragoza signed a document titled, “Petition and Order For Amendment of Order of Probation” to acknowledge this extension.

8. On or about December 13, 2021, Zaragoza was directed to report to meet with his supervising Michigan Department of Corrections (MDOC) Probation Officer (PO). The PO had previously developed concerns Zaragoza had violated his curfew. During her investigation, it was reported to her that Zaragoza had a cellular telephone in violation of his terms of probation. During the meeting with his PO, Zaragoza’s vehicle was searched pursuant to the terms of his Probation Order. A cellular telephone was located. Thereafter, Zaragoza admitted to having child

pornography on the device. He further admitted to possessing child pornography on a USB Thumb Drive at his residence.

9. A search of his room at his residence was conducted and several items were located, including two USB Thumb Drives and a Google Chromebook. Following this search, Zaragoza consented to a search of his cellular telephone, two USB Thumb Drives, and the Google Chromebook, by signing a Tuscola County Sheriff's Office "Consent to Search Electronic Media Devices" form.

10. The items were submitted to the Michigan State Police (MSP), Computer Crimes Unit (CCU), Bridgeport, Michigan, and forensically searched. On one of the thumb drives, more than 1,000 images and videos depicting child pornography, including images and/or videos depicting children under 5 years of age and bondage, were located. One of the videos is described as follows:

- A video titled "2013_2yo girl cries while daddy fucks her ass.mp4" is a video approximately two minutes and 18 seconds in duration. It depicts the vaginal area of a young girl who appears to be less than approximately three years old. The child appears to be lying on her back with her legs spread open, and an adult, erect penis is seen penetrating her anus. Her vaginal area is clearly visible. A very young

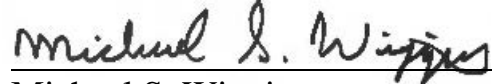
child can be heard crying during the video. During one portion of the video, a male voice can be heard saying, "...good girl...good baby."

11. On or about February 11, 2022, Tuscola County Sheriff's Office Detective James Hook and I interviewed Zaragoza at the Saginaw County Jail. After being advised of his *Miranda* rights, Zaragoza admitted to using his cellular telephone to search for other individuals with whom he could trade child pornography. He further admitted to transferring the child pornography he had downloaded to his cellular telephone to one of the USB Thumb Drives to store it. He would later view the child pornography he had saved. He explained he would search for child pornography involving 14 to 15 year old girls for himself but that he would download and store a wide range of child pornography. He kept child pornography involving ages and subject matter in which he was not necessarily interested so that he could trade it with other individuals in exchange for what he wanted. He agreed his collection included child pornography involving children as young as two or three years old.


CONCLUSION

12. Based on the aforementioned facts, there is probable cause to believe that Brent Alan-DuColon Zaragoza violated 18 U.S.C. § 2252A(a)(5) and (b)(1)

(Possession of Child Pornography) within the Eastern District of Michigan.


Michael S. Wiggins
Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means.


Hon. Patricia T. Morris
United States Magistrate Judge